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BY ELECTRONIC FILING

Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Robert Kelly, Case No. 19-286 (S-1)(AMD)

Dear Judge Donnelly:

We respectfully submit this letter as an additional Reply in support of the most recent request for release from pre-trial detention. We are submitting this additional reply solely and exclusively on the issue of obstruction.

The Second Superseding Indictment contains six alleged victims, all referred to as “Jane Doe”. While the number of “Jane Doe’s” has remained consistent at six, at least one individual was dropped from the initial indictment, and one added.

The defense has previously requested that each of them be identified. This Court denied that request with respect to Jane Doe’s two and three, meaning to this date their identities remain unknown to the defense. (Doc. 38). The government has identified a picture of Jane Doe number four, and provided no further information. To date, predicated solely upon the picture, the defense has been unable to identify who that individual is. This means that the defense, and Mr. Kelly, do not know the identity of three of the six Jane Does.

Jane Doe number one appears to be a deceased individual. The only other individual who has spoken or been identified regarding that allegation has been actively talking about his appearance before the federal grand jury on social media. He has never suggested that anyone has reached out to him on behalf of Mr. Kelly, and no-one has.

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Jane Doe number five is Mr. Kelly's former girlfriend, who contrary to what typically takes place between victims/witnesses and the accused, was allowed unfettered access to Mr. Kelly, and, as previously noted in our reply and earlier pleadings, has not made any suggestion that he obstructed. But to the point for this additional filing, it would be impossible for Mr. Kelly to engage in any obstructive behavior regarding this individual. She has, since leaving Mr. Kelly, created a active, for-profit, social media presence, requesting individuals to subscribe to her Instagram and YouTube channels, where she regularly speaks of how awful he was.

Yesterday, on a channel she titled [REDACTED] found at [https://www.youtube.com/channel/\[REDACTED\]](https://www.youtube.com/channel/[REDACTED]), at the approximately 42 minute mark, she takes a Versace winter coat that she stole from Mr. Kelly and cuts it up, showering herself in the feather filling. Excerpt here [https://www.youtube.com/watch/\[REDACTED\]](https://www.youtube.com/watch/[REDACTED]). It is clear from the audio that this was a premeditated stunt to gain viewers, with her mother in the background commenting that they had discussed using a knife and how that would have been much easier than using scissors. The rest of the video, as well as her others, has this Jane Doe talking extensively about her relationship with Mr. Kelly and her status as a victim. She is using her status to promote her brand. Watching all of this, it is obvious that she long ago rejected any allegiance to Mr. Kelly, could not be influenced by him or others acting on his behalf, and that any idea of a fear of obstruction here is simple fantasy.

The remaining Jane Doe is number five, who is represented by counsel in relation to this case as well as a related civil suit she is filed. Mr. Kelly is similarly represented in that civil suit. She too has an active social media presence, much of which can be found by searching the twitter hashtag [REDACTED]. Like Jane Doe number five, she has created a vast inventory of negative media regarding Mr. Kelly. Like with Jane Doe number five, any idea that there is a fear of obstruction here is simple fantasy.

To the extent this court has previously been led to believe that there may be a risk of obstruction, the fact is that there is no one related to this case who would be the slightest bit receptive to any overture from the Kelly camp. There is no risk.

We request the Court accept this additional filing.

Respectfully submitted,

/s/ Steven Greenberg

/s/ Micheal Leonard

On behalf of Mr. Kelly